

A-G7 9 @5 B9CI G'H9LH'fl 97 : cfa ' - - L

PAGE 1 / 1

March 27, 2013

Jill Sugarman
Reports Analysis Division
Federal Election Commission
Washington, DC 20463

Re: Human Rights Campaign (July Quarterly Report 4/1/2012 ? 6/30/2012)
Identification Number: C90012626

This letter responds to your request for additional information dated February 27, 2013 regarding HRC?s July 2012 Quarterly Report and follows our telephone conversation of March 20, 2013 and your voice mail of March 21, 2013.

1.You request that HRC disclose contributions that were used to fund the independent expenditures reported on the above-referenced reports. Your letter states that ?[e]ach contributor who made a donation in excess of \$200 to further the independent expenditure(s) must be itemized on Schedule 5-A, including their identification information.? The regulation that you cite requires the identification of any person who makes a contribution in excess of \$200 to the filer ?which contribution was made for the purpose of furthering the independent expenditure.? See 11 CFR ?109.10(e)(1)(vi) (emphasis added). Consistent with the regulation and the Commission?s guidance on this issue, HRC is required to itemize contributions that were made by a contributor for the purpose of furthering an independent expenditure. The regulation does not require the identification of contributors who give to the organization to support its general programs without specifying that the contribution is ?for the purpose? of making an independent expenditure. HRC has not received any contributions that were made by a contributor ?for the purpose of furthering? an independent expenditure and therefore has not amended any reports in response to your request.

2.You note that HRC disclosed certain independent expenditures that did not appear on 48-hour reports. First, HRC disclosed the May 1, 2012 expenditure you identify on a 48-hour report filed May 10, 2012. Second, HRC disclosed the other expenditures you identify before any 48-hour reports were due. You state that ?in the [48-hour] report, you must include information for all independent expenditures that have not been previously reported? (emphasis added). Because HRC had already reported these expenditures on its quarterly report, we believed that further disclosure on a 48-hour report was not required. Pursuant to our telephone conversation and your voice mail, we understand that the Commission interprets 11 CFR ?109.10(c) to require 48-hour reports for each \$10,000 expended regardless whether the expenditures were previously reported on a quarterly report. In the future HRC will report independent expenditures pursuant to your guidance.

Should you need further information regarding your request, please contact Darrin Hurwitz, Deputy General Counsel, at (202) 572-8914.

Sincerely,
Jim Rinefierd
Treasurer
